



HEALTH & SAFETY INTERVENTION PLAN 2015-2016

1. Introduction

The range of enforcement and advisory activities of the Health & Safety enforcement function contributes to and supports a number of Key Policy Priorities of the Strategic Aims of City of London's [Corporate Plan 2013-2017](#):-

- ***To provide modern, efficient and high quality local services and policing within the Square Mile for workers, residents and visitors with a view to delivering sustainable outcomes,***
- ***To provide valued services to London and the nation,***

and in particular contributes to **The City Joint Health and Wellbeing Strategy** .

2. Our Key Challenges for 2015-2018

- Continuing adjustments to meet the National Local Authority Enforcement Code¹ (the Code) and Regulators Code, using the available sources of intelligence on risks and compliance in order to target interventions where there is the greatest risk.
- Continuing to develop officer skills and competency across PH&PP to effectively apply the range of interventions necessary to identify and communicate with City businesses and workers and meet the above Codes.

3. KPIs for 2015-2016

The following are the Key Performance Indicators for this year:-

- To complete a risk-based intervention programme for all cooling towers systems within the year.
- To implement all Health & Safety Intervention Plan projects and programmes within the year.

3. Competent and trained officers

In order to ensure that the service we offer to businesses and workers is competent and high quality, we will ensure that:

- all officers carrying out enforcement work are appropriately authorised, and their competence assessed; this includes participating in peer reviews with other local authorities when arrangements are available; and

¹ [National Enforcement Code for Local Authorities - Health & Safety](#)

- we use feedback from businesses and other service users on the quality of the service we provide and strive to continually improve.

5. City of London Priorities 2015-2016

Local and National Priorities which the City will be addressing in 2015-2016 are:

- **Legionella infection at premises with cooling towers** – through conducting inspections of cooling towers within the City. Premises are inspected at frequencies based on risk management performance, an approach supported by evidence and agreed by Members. Local intelligence on risk management performance has led to the development of reduced intervals between inspections.
- **Fatalities / injuries resulting from being struck by a vehicle and falls from height in wholesale, warehouses and distribution** – inspections and advisory visits to stallholder areas at Smithfield Market, based on risk management performance.
- **Event Safety / Crowd control at large public sports / leisure events** – through working with organisers, dutyholders and other City Corporation departments in the prior planning and permissioning of events.
- **Falls from height** related to cleaning and servicing buildings, based on local intelligence, using inspections where appropriate, awareness raising by working with stakeholders and using social and web based media to promote best practice.
- **Workplace health and wellbeing** – identified as a priority by local City-based research and City Joint Health and Wellbeing Strategy, including mental health; working with other stakeholders to promote good practice and supporting businesses through advice, audits, London Healthy Workplace Charter, 'Business Healthy initiative', web and social media.

The Health and Safety service targets for the year are provided in more detail in the **ANNEX**.

7. Working in Partnership

In order to achieve its aims and objectives, the City of London will continue to work with a variety other agencies, stakeholders and intermediaries and these include:-

- **London LA's Enforcement Community and Partnership; London Partnership and Strategy Group, Association of London Environmental Health Managers (Alehm), All-London Boroughs Health & Safety Liaison Group, London SE Quadrant LA's** – through active involvement in this community, sharing of experiences and encouraging consistency and cross-LA working in London;
- **Health and Safety Executive (HSE)** – contribute to national policy, strategy and guidance; operational support; London Local Authority Liaison strategic support.
- **Better Regulation Delivery Office** – Primary Authority Partnership scheme and other local authority regulatory services projects, including the Leisure Industry Expert Panel;
- **London Banks Health & Safety Forum / London Managing Agents Forum** - working with City financial and property management sectors to promote compliance and good practice, share best practice across the sectors, receive feedback on service delivery and consult on plans and projects.

- **The Legionella Control Association** - representing LA enforcement community, raise standards in service providers involved in the supply of goods and services relating to the control of Legionella bacteria in water systems.
- **HSE / Public Health England national working group** review of guidance on control of legionella in spa pools, supporting training for other health professionals on legionella control by facilitating site visits and contributing to video production
- **HSE Cleaning industry Liaison Forum** – representing LA enforcement community: working with industry trade associations, training bodies and trade unions to improve health, safety and welfare standards in the cleaning industry.
- **City of London Health and Wellbeing Board** – providing advice and linking health & safety into the public health agenda, in particular worker mental health issues.
- **London Healthy Workplace Charter** – supporting the GLA's charter scheme's development and sharing good practice.
- **Primary Authority Partners** – Virgin Active, CBRE and Ornamental Aquatic Trade Association (OATA)

9. Service Development

We will continue to develop and improve overall health & safety intervention capacity to help and support businesses and workers, and to take enforcement action where appropriate;

- **Customer surveys** – feedback on surveys of businesses carried out in 2014-2015 relating to cooling tower inspections were very positive; we will carry out further surveys of our customers across key elements of the service and use the results to inform service improvements;
- **Skills for the new enforcement intervention landscape** – we will continue to improve officers' awareness and understanding of business' needs, how to effectively communicate health and safety messages using a broader range of intervention strategies.
- **Test resilience of the Legionella Outbreak Plan** – having reviewed our communications capacity in 2014-2015, we will assess and test key steps in our outbreak response plan to ensure it is fit for purpose;

We will continue to promote and publicise our Health & Safety Enforcing Authority work, as well as our role to provide high quality and authoritative advice to City businesses and workers in support of business growth.

Jon Aaverns
Port Health & Public Protection Director

April 2015

HEALTH & SAFETY INTERVENTION PLAN TARGETS 2015-2016

PRO-ACTIVE INTERVENTIONS – National Priorities

Sector, premises type or specific cross sector activity	Evidence that identified the concern and set its priority ²	Planned intervention type ³	Rationale for intervention	Planned activity or resource
<p>Control of legionella interventions: cooling towers and other at risk water systems.</p>	<p>National and local priority.</p> <p>151 cooling towers sites within the City.</p> <p>Risk of Legionnaires' disease outbreak affecting the Square Mile is considered an unacceptable reputational risk.</p> <p>Poor performers identified via established risk ratings and local intelligence.</p>	<p>Inspection and enforcement</p> <p>Education and awareness</p> <p>Working with intermediaries, Legionella Control Association, London Banks H&S Forum, Managing Agents Forum</p> <p>Working to influence design at planning stage through CDM.</p>	<p>Due to the complex nature of the water systems involved it is essential to carry out a detailed audit in order to make a competent assessment of risk.</p> <p>Established intervention protocol utilised.</p> <p>Outputs measured via lower risk ratings following intervention.</p>	<p>Risk-based audit of 75 Cooling Tower sites</p> <p>Revisits and enforcement action taken as necessary</p> <p>Response to Planning applications and advice to designers and CDM Co-ordinators.</p> <p>Test resilience of the Legionella Outbreak Plan – test key steps in our outbreak response plan to ensure it is fit for purpose (30hrs)</p> <p>Estimated Total 75 sites at 5hrs per site = 400 hrs;</p>

² Evidence types detailed in Supplementary Materials 6 of LAC 67-2 rev4 www.hse.gov.uk/lau/lacs/67-2/supplementary-material-6-potential-sources-of-information-to-aid.pdf

³ Planned Intervention Types detailed in Annex A of LAC 67-2 rev4 www.hse.gov.uk/lau/lacs/67-2/annexe-a-Intervention-types.pdf

Sector, premises type or specific cross sector activity	Evidence that identified the concern and set its priority ⁴	Planned intervention type ⁵	Rationale for intervention	Planned activity or resource
<p>Health and Safety interventions at Smithfield Meat Market: Fatalities / injuries resulting from being struck by a vehicle and falls from height.</p>	<p>National Priority</p> <p>Risk rating, past performance, FSA / CoL Authorised Officer intelligence from food safety inspections, and confidence in management.</p>	<p>Inspection (Cat A), and enforcement</p> <p>Matters of evident concern</p> <p>Education and awareness</p> <p>Working with Smithfield Market management office, Smithfield Markets Tenants Association and the HSE.</p>	<p>Targeting uncontrolled risks in the stallholder areas.</p> <p>Inspections and enforcement in highest risk premises and where risks not adequately controlled.</p> <p>Education / awareness</p> <p>Influencing business owners</p>	<p>Interventions focusing on the highest risk hazard and matters of evident concern with enforcement action taken as necessary</p> <p>4 premises to be targeted where Fork Lift Trucks operates inside those premises, also focussing on falls from height risks associated with storage racking.</p> <p>Remaining premises – Matters of Evident Concern or advisory visits</p>
<p>Event Safety / Crowd control at large public sports / leisure events</p>	<p>Large scale events are a National Priority.</p> <p>City Corporation is host to many high profile events.</p> <p>City are the enforcement authority for approximately 6 large higher risk events.</p>	<p>Education and awareness</p> <p>Liaison with event organisers</p> <p>Inspection and Enforcement for highest risk activities</p>	<p>Involved at planning stages of events through the City's Safety Advisory Group (SAG) and discussion with event organisers.</p> <p>Intelligence is shared between the Met and City of London Police, LFCDA, London Ambulance, Highways, etc.</p>	<p>Review event plans and risk assessments of high risk events. Visits to site as necessary. Follow-up action taken as necessary</p> <p>Estimated Total - 10 large events and 20 smaller ones , = 50 hrs</p>

4 Evidence types detailed in Supplementary Materials 6 of LAC 67-2 rev4 www.hse.gov.uk/lau/lacs/67-2/supplementary-material-6-potential-sources-of-information-to-aid.pdf

5 Planned Intervention Types detailed in Annex A of LAC 67-2 rev4 www.hse.gov.uk/lau/lacs/67-2/annexe-a-Intervention-types.pdf

Sector, premises type or specific cross sector activity	Evidence that identified the concern and set its priority ⁶	Planned intervention type ⁷	Rationale for intervention	Planned activity or resource
<p>Falls from Height related to external building cleaning and servicing</p> <p>Building on valuable work carried out in 2014-15 and in response to demand from businesses and intermediaries.</p>	<p>Local intelligence and observations made by CoLC officers in 2014-15; others in the facilities management, 'access' design and operations community,</p>	<p>Education and awareness.</p> <p>Advisory visits</p> <p>Training for duty-holders</p> <p>Inspection and enforcement for Matters Of Evident Concern (MOEC).</p> <p>Working with intermediaries, London Banks H&S Forum, Managing Agents Forum, SAEMA, Cleaning Industry Liaison Forum (CILF)</p> <p>Working to influence design at planning stage through CDM</p>	<p>Large number of sites where external working at height (WAH) carried out.</p> <p>Hazards and risks high: Poor practices, poor design, poor awareness by duty-holders: information from:</p> <ul style="list-style-type: none"> - Findings of advisory visits and training sessions; - views of reputable members of the building access industry through 1-2-1 discussions, meetings and training events. <p>Building managers usually keen to understand the risks and receptive to awareness raising - e.g. popularity of recent videos by H&S Team</p> <p>Some sites may need direct enforcement intervention on MOEC or where non-compliance on follow up to advisory visits</p>	<p>Observations during street walks, dealing with matters of evident concern</p> <p>Estimate 10 interventions, 30hrs</p> <p>Training and briefings to facilities managers – x2 16hrs</p> <p>Awareness raising by working with stakeholders and using social and web-based media - e.g. Twitter account and promoting 2 new videos produced in 2014-15. Estimate: 54hrs</p> <p>Response to Planning applications and use of applications to trigger advice to designers and CDM Co-ordinators.</p> <p>Estimated Total = 100hrs</p>

⁶ Evidence types detailed in Supplementary Materials 6 of LAC 67-2 rev4 www.hse.gov.uk/lau/lacs/67-2/supplementary-material-6-potential-sources-of-information-to-aid.pdf

⁷ Planned Intervention Types detailed in Annex A of LAC 67-2 rev4 www.hse.gov.uk/lau/lacs/67-2/annexe-a-Intervention-types.pdf

Sector, premises type or specific cross sector activity	Evidence that identified the concern and set its priority ⁸	Planned intervention type ⁹	Rationale for intervention	Planned activity or resource
<p>Workplace health and wellbeing: Including Workplace Wellbeing Charter</p> <p>Building on work carried out in 2014-15</p>	<p><i>Identified as a local priority by City-based research and the City & Hackney's Joint Health and Wellbeing Strategy, including mental health.</i></p> <p><i>Labour Force Survey</i></p>	<p>Recognising good performance through the GLA's London Healthy Workplace Charter and City of London Sustainability Awards.</p> <p>Partnerships – working through the City of London Health and Wellbeing Board and Business Healthy initiative</p> <p>Intermediaries – such as managing agents and London Banks Health and Safety Forum.</p>	<p>There is strong evidence to show how having a healthy workforce can reduce sickness absence, lower staff turnover and boost productivity - this is good for employers, workers and the wider economy.</p> <p>As part of the steering group working with the Department of Health / GLA to promote engagement and business uptake with the Charter, and to help further develop the scheme.</p>	<p>Engagement with potential businesses using existing networks and resources such as City Business Library and CoLC Economic Development Office, Dept. of Community & Children Services Public Health Team.</p> <p>Working with other stakeholders to promote good practice and supporting businesses through advice, audits, London Healthy Workplace Charter, 'Business Healthy' initiative, web and social media.</p> <p>Working with any interested businesses towards an award. Estimate 3 Charter assessments = 50 hrs</p> <p>London Healthy Workplace Charter Steering Group and City development meetings and activities = 120 hrs</p> <p>CoLC Charter assessment activities = 20 hrs</p> <p>Sustainable City Awards = 7hrs</p> <p>Estimated Total 197hrs</p>

⁸ Evidence types detailed in Supplementary Materials 6 of LAC 67-2 (rev4) www.hse.gov.uk/lau/lacs/67-2/supplementary-material-6-potential-sources-of-information-to-aid.pdf

⁹ Planned Intervention Types detailed in Annex A of LAC 67-2 (rev4) www.hse.gov.uk/lau/lacs/67-2/annexe-a-Intervention-types.pdf

Sector, premises type or specific cross sector activity	Evidence that identified the concern and set its priority ¹⁰	Planned intervention type ¹¹	Rationale for intervention	Planned activity or resource
<p>Health and safety interventions in food premises: Slips, trips and Falls; falls from height; gas safety; manual handling; burns.</p>	<p>RIDDOR and enforcement data on M3 for 2014-15; EHO intelligence from food safety inspections, confidence in management.</p>	<p>Enforcement on Matters of Evident Concern (MOEC) Advice, education and awareness</p>	<p>Food premises are some of the highest risk premises enforced by City of London and also contain highest proportion of SMEs where risk management is weakest.</p>	<p>Advice and information during food safety or standards inspections, 1000 x 10mins = 165hrs Interventions when matters of evident concern encountered with enforcement action taken as necessary. Observations and intelligence gathered will used to inform our overall business planning for 2016-17 MOEC Estimate = 30 hrs Estimated Total = 195hrs</p>

¹⁰ Evidence types detailed in Supplementary Materials 6 of LAC 67-2 rev4 www.hse.gov.uk/lau/lacs/67-2/supplementary-material-6-potential-sources-of-information-to-aid.pdf

¹¹ Planned Intervention Types detailed in Annex A of LAC 67-2 rev4 www.hse.gov.uk/lau/lacs/67-2/annexe-a-intervention-types.pdf

Sector, premises type or specific cross sector activity	Evidence that identified the concern and set its priority ¹²	Planned intervention type ¹³	Rationale for intervention	Planned activity or resource
<p>Primary Authority: CBRE, Virgin Active and OATA</p> <p>Explore opportunities for increasing the Primary Authority Partnership Portfolio</p>	<p>Ensuring progress towards the Government's better regulation agenda, providing streamlined and improved regulation.</p>	<p>Partnerships</p> <p>Motivating Senior Managers</p> <p>Supply Chain</p> <p>Design and supply</p> <p>Advice, education and awareness</p>	<p>Partnerships established as part of the Better Regulation Delivery Office's initiative.</p>	<p>Virgin Active: Estimate = 320-420 hrs</p> <ul style="list-style-type: none"> - Review around 15 policies - 10 Premises Audits: July /August - Involvement with development of Leisure Industry Expert Panel <p>CBRE: Estimate 60hrs</p> <p>OATA : New trade association Primary Authority Partnership. Estimate 10-20hrs</p> <p>Developing Assured Advice</p> <p>Advising on new H&S developments</p> <p>Respond to challenges from other health & safety regulators</p> <p>Estimated Total = 400-500 hrs</p>

12 Evidence types detailed in Supplementary Materials 6 of LAC 67-2 rev4 www.hse.gov.uk/lau/lacs/67-2/supplementary-material-6-potential-sources-of-information-to-aid.pdf

13 Planned Intervention Types detailed in Annex A of LAC 67-2 rev4 www.hse.gov.uk/lau/lacs/67-2/annexe-a-intervention-types.pdf

REACTIVE INTERVENTIONS				
Sector, premises type or specific cross sector activity	Evidence that identified the concern and set its priority	Planned intervention type	Rationale for intervention	Planned activity or resource
<p>Notifications under RIDDOR:</p> <ul style="list-style-type: none"> • Accidents and Dangerous Occurrence • Occupational Ill-health 	<p>Accidents, Dangerous Occurrences and Work-related ill-health are indicators and intelligence of both common safety risks and areas of non-compliance across both industry sectors and City businesses as a whole</p>	<p>Incident and ill health investigation</p>	<p>In accordance with the Incident Selection Criteria Guidance LAC 22/13¹⁴</p>	<p>Establish key facts and available evidence</p> <p>Determine whether further investigation is required in accordance with LAC 22/13</p> <p>Follow-up enforcement action taken in accordance with Enforcement Management Model (EMM)</p> <p>Estimate 200 hrs</p> <p>Additionally an investigation into a fatality in 2012 may progress to a Court hearing; anticipated resource: 100 hrs</p> <p>Estimated Total = 300</p>

¹⁴ Health and Safety Executive and Local Authorities Enforcement Liaison Committee (HELA) Incident Selection Criteria www.hse.gov.uk/lau/lacs/22-13.htm

REACTIVE INTERVENTIONS				
Sector, premises type or specific cross sector activity	Evidence that identified the concern and set its priority	Planned intervention type	Rationale for intervention	Planned activity or resource
<p>Complaints & Service Requests</p> <ul style="list-style-type: none"> • Complaints • Asbestos notifications • LOLER reports • Pressure vessels • Massage and Special Treatment (MST) Licensing Inspection 	<p>Statutory Adverse Insurance Reports (AIR's) may indicate poor management and /or maintenance practices.</p>	<p>Investigations, inspections where appropriate Advice</p>	<p>Local response policy Input to local licensing arrangements of MST activities</p>	<p>Research and provision of health & safety advice.</p> <p>Establish key facts of complaints and adverse reports; investigation and inspection for selected complaints and reports in accordance with risks and duty-holder performance.</p> <p>Follow-up enforcement action taken in accordance with the HSE's Enforcement Management Model (EMM)</p> <p>All complaints and service requests estimate = 250 hrs; 45 MST inspections = 135hrs</p> <p>Estimated Total = 385hrs</p>

REACTIVE INTERVENTIONS				
Sector, premises type or specific cross sector activity	Evidence that identified the concern and set its priority	Planned intervention type	Rationale for intervention	Planned activity or resource
<p><i>To review planning applications and make representations where appropriate</i></p>	<p>Working with architects, designers, planners and engineers at planning stage is essential to design out issues that can become a health & safety risk on completion.</p> <p>Discussions held on work at height - i.e. window cleaning, legionella control, prevention of slips and trips, workplace transport</p>	<p>Education and awareness</p>	<p>Requested by CoLC's Planning & Transportation Service as part of the planning process.</p>	<p>Scrutinise and comment on applications where appropriate.</p> <p>Advise on CDM regulations & workplace regulations.</p> <p>Visits to premises as necessary.</p> <p>Estimate 10 pre-applications: 30hrs 30 planning applications: 60hrs.</p> <p>Estimated Total = 90hrs</p>